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March 29, 2024

Via ECF

Hon. Marcia M. Henry
United States Magistrate Judge
United States District Court
Eastern District of New York

Re: *Allstate Ins. Co., et al. v. Accelerated Surg. Ctr. of N. Jersey, LLC, et al.*,
Index No. 23-CV-6194 (EK) (MMH)
Joint Status Report of the Parties

Dear Judge Henry:

We represent the Plaintiffs Allstate Insurance Company, Allstate Indemnity Company, Allstate Property & Casualty Insurance Company, and Allstate Fire & Casualty Insurance Company ("Plaintiffs") in this action., and we write, jointly with the undersigned counsel for the Defendants Irfan Ahmad Alladin, M.D., Sam Rahat a/k/a Rahat-Muqtadir, Accelerated Surgical Center of North Jersey LLC, Bailey Outpatient Medical Services P.C., Barnert Surgical Center, LLC, and Irfan A. Alladin MD, P.C. (the "Alladin Defendants"), and for the Defendants Alexandr Alexeevich Zaitsev, MD, Eugene Seth Gorman, M.D., and Ridgewood Diagnostic Laboratory LLC, (the "Zaitsev Defendants," and with the Plaintiffs and the Alladin Defendants, the "Parties"), to respectfully submit this Joint Status Report in accordance with the Court's Order of December 8, 2023.

Since the initial conference with Your Honor, the Parties have worked diligently on discovery matters as well as settlement discussions, and they have made significant progress on both fronts.

Plaintiffs and the Alladin Defendants have reached an agreement in principle to settle all claims between them in this action, and we are now actively working together to finalize the definitive settlement documents. Once this process is completed, we intend to file an appropriate

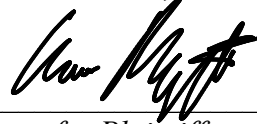
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stipulation of discontinuance for the Court's consideration and entry, and we will advise the Court if there are any other developments.

Plaintiffs and the Zaitsev Defendants have exchanged their first interrogatories and requests for production of documents, and they will soon serve their respective responses to the same. Due to the complexity of this case and the volume of relevant documents to be reviewed and produced, Plaintiffs and the Zaitsev Defendants have mutually agreed to extend their time to respond to the discovery demands, and we expect that the responses will be served within two weeks' time.

Respectfully submitted,

SHORT & BILLY, P.C.



Attorneys for Plaintiffs

LUNDGREN, THWAITES & D'ARCY

/s/ Kurt Lundgren

Attorneys for Defendants Irfan Ahmad Alladin, M.D., Sam Rahat a/k/a Rahat-Muqtadir, Accelerated Surgical Center of North Jersey LLC, Bailey Outpatient Medical Services P.C., Barnert Surgical Center, LLC, and Irfan A. Alladin MD, P.C.

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